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12 UNITED STATES DISTRICT COURT  
13 EASTERN DISTRICT OF CALIFORNIA

14 VINCENT BERNARD DAVIS,  
15 Plaintiff,  
16 v.  
17 MARTIN O'MALLEY,  
18 Commissioner of Social Security,  
19 Defendant.

No. 2:24-cv-01874-CKD

STIPULATED MOTION AND ORDER FOR  
AN EXTENSION OF TIME TO RESPOND TO  
PLAINTIFF'S MOTION FOR SUMMARY  
JUDGMENT

20  
21 IT IS HEREBY STIPULATED, by and between the parties through their respective  
22 counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's  
23 Motion for Summary Judgment be extended fourteen (14) days from November 22, 2024 to  
24 December 6, 2024. This is Defendant's second request for an extension. Counsel for Plaintiff  
25 has no objection to Defendant's request for an extension.

26 Good cause exists for this request. Defendant respectfully requests this additional time  
27 because Counsel for Defendant has and will be unable to devote the time required to complete its  
28

1 response. Counsel has multiple merit briefs currently due in district court cases within the next  
2 week. Counsel for Defendant was out of the office the past couple days providing care for his  
3 child that is out sick and Counsel will also be out of the office on November 26-29, 2024. Given  
4 competing workload requirements and pending travel an extension until December 6, 2024 will  
5 provide the opportunity for the undersigned Counsel for Defendant to prioritize completing the  
6 response to Plaintiff's Motion for Summary Judgment. The undersigned Counsel apologizes to  
7 the Court and Plaintiff's counsel for any inconvenience caused by this request and delay. All  
8 other dates in the Court's Scheduling Order shall be extended accordingly.

9  
10 Respectfully submitted,

11 PHILLIP A. TALBERT  
12 United States Attorney

13 DATE: November 22, 2024

14 By: s/ Oscar Gonzalez de Llano  
15 OSCAR GONZALEZ DE LLANO  
16 Special Assistant United States Attorney  
17 Attorneys for Defendant

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19 Respectfully submitted,

20 Law Offices of Lawrence D. Rohlfig, Inc., CPC

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22 DATE: November 22, 2024

23 By: s/ Steven Gilbert Rosales \*  
24 Steven Gilbert Rosales  
25 (\*as authorized by email)  
26 Attorney for Plaintiff  
27  
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ORDER

IT IS ORDERED that Defendant's stipulated motion for extension of time (ECF No. 14) is GRANTED. Defendant shall have an extension, up to and including December 6, 2024, to respond to Plaintiff's Motion for Summary Judgment.

Dated: November 26, 2024



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CAROLYN K. DELANEY  
UNITED STATES MAGISTRATE JUDGE